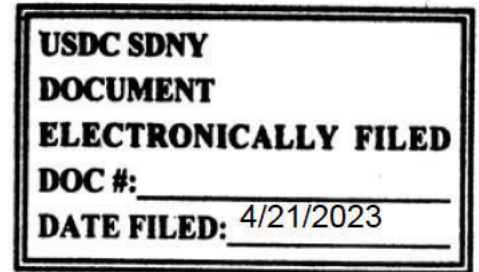


April 20, 2023

Via ECF

The Honorable Robert W. Lehrburger, U.S.M.J.
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Courtroom 18D
 New York, NY 10007



Re: *Tang Capital Partners, LP v. BRC Inc.*, No. 22-cv-3476 (RWL)
Joint Letter Requesting Extension of Discovery Schedule

Dear Judge Lehrburger:

The parties in the above-captioned action respectfully submit this joint letter to request an extension of the April 28, 2023 deadlines for the completion of all fact discovery and fact witness depositions, as well as all other subsequent discovery deadlines listed in the Amended Scheduling Order (ECF No. 44). The parties have requested one prior extension of the case scheduling deadlines, which the Court granted. (*Id.*) The parties have conferred and submit that good cause exists for the requested discovery extension.

Status of Discovery. In accordance with the operative scheduling order (ECF No. 44), the deadline for the completion of all fact discovery is April 28, 2023. Although both parties have made document productions to date, there have been additional discovery requests, and certain discovery disputes which the parties are meeting and conferring about in hopes of reaching a resolution. As a result, document discovery remains ongoing and will not be completed by the current deadline. The parties have noticed depositions but agreed to stay those deposition notices pending the completion of document production and a meet-and-confer regarding deposition scheduling.

Proposed Schedule. The parties seek an extension of the discovery schedule as set forth in this table:

Event	Current Deadline (ECF No. 44)	Proposed Deadline
Complete document productions and written fact discovery. ¹	04/28/2023	05/12/2023
Complete third-party document discovery.	04/28/2023	05/31/2023
Complete fact witness depositions.	04/28/2023	07/14/2023
Meet and confer on an expert discovery schedule. ²	03/21/2023	07/10/2023

¹ The parties reserve the right to seek additional documents that come to light during fact witness depositions.

² The operative scheduling order (ECF No. 44) requires the completion of expert discovery on or before July 21, 2023. In light of the revised proposed schedule above, the parties intend to meet and confer regarding the expert

The Honorable Robert W. Lehrburger, U.S.M.J.

April 20, 2023

Page 2

We thank the Court for its consideration.

Respectfully submitted,

By: /s/ Reed Brodsky

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Counsel for Defendant BRC Inc.

Granted.

SO ORDERED:

4/21/2023



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

discovery schedule and a revised date for the completion of expert discovery.